

From: Dawn Taylor
To: Jan Simmons
Subject: Re: Need Gillem update
Date: 11/08/2012 01:40 PM

Got it thanks! Can you send me a copy of the msg u sent to tesner? He mentioned it this morning, but hadn't seen it.
Sent from my Blackberry

----- Original Message -----
From: "Jan Simmons" [Jan.Simmons@dnr.state.ga.us]
Sent: 11/08/2012 08:17 AM EST
To: Cathy Amoroso; Don Rigger; Dawn Taylor; Jennifer Wendel
Cc: "Amy Potter" <Amy.Potter@dnr.state.ga.us>
Subject: Re: Need Gillem update

I sent this email yesterday, but we were (and may still be) having some email problems and I'm not sure if it actually 'sent'. So, I'm resending. If one of you would let me know you got this, I would appreciate it. Thanks!

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Hi all:

I apologize for the late response. I have been working on an e-mail to John Tesner, which is attached. I sent it as a follow-up to a discussion that I had with him at an ASTSWOMtg last month.

Thanks Dawn for the "key issues" write up. We've made some minor adjustments to it (redlined), and included it as an attachment. In a subsequent email(s), I'll send you the email and attachments to John Tesner.

Note that we were also to have a meeting with Tom Luderle (who works for John), but upper management decided to cancel the meeting until there was something more substantive to discuss, as it was reported to be a presentation on BRAC and its successes, and not the Army's plan to address contamination problems at the site. We have not seen movement towards resolution to keep them off the NPL.

As for the Governor's support, Jud Turner, our new EPD Director, has met with the Governor on this, and, we currently have his support if listing is necessary.

Thanks for all your help on this!

>>> <Taylor.Dawn@epamail.epa.gov> 11/7/2012 11:13 AM >>>
Jan/Amy-
HQs (Reggie Cheatham) has a regular quarterly meeting with the Army tomorrow (Thurs 11/8) at 10 am and John Tesner has specifically asked that
Gillem (among other potential NPL sites - Wallops, Stratford, etc.) be on
the agenda. Reggie asked me to get a status update from you and also to
put together some key issues that should be highlighted to Tesner at the
meeting. Can you get me a status update? I took a stab at putting
together the 4 main issues I have heard related to lack of progress at
the
site - are these accurate and are you ok with me providing this info to
Reggie to discuss with Tesner tomorrow? Also, is there any update on if
the Governor will support listing this site and are we still on track
for
potential listing in April 2013? I think a deadline of Dec 1 had been
discussed regarding when the State would let EPA know if we should send
the state concurrence request letter or not.
Thanks
Dawn

Items to highlight to Tesner tomorrow regarding Gillem:

#1. Off site ground water plumes discovered in the 1990s have not been contained, let alone remediated, and are still spreading. Off-site contamination is not being addressed, and there seems to be no plan in place to address it. The State has stressed to the Army the need to fully characterize the off-site ground water plume and potential vapor intrusion, but there has been no commitment by the Army to do this. The

Army and the Local Redevelopment Authority (LRA) are planning to work out
a deal in which they divide clean up responsibilities in some way, but that applies only to the facility property and does not apply to contamination beyond the facility boundary. Since there is no site management plan, schedule for cleanup, milestones, etc., in place, it is unclear what the LRA is agreeing to do and what the Army is agreeing to do
with respect to investigation and clean up.

#2. There is no site management plan, no overarching schedule for investigation and clean up of the known "sites," no milestones, etc.
Army

BRAC office does not intend to add any new areas of concern to the program, even when specifically requested by State.

#3. The Army has made it's own "clean parcel determination" under CERCLA 120 h (1) ("CERFA") , without any regulatory concurrence (which isn't required since the site isn't on the NPL), encompassing 70% of the installation, most of which is based on absence of reported releases rather than affirmative information that the area is truly a clean parcel.

The State's written comments regarding areas of concern within the "clean parcel" have been ignored. The State has asked for additional investigation in and there has been quite a bit of resistance to doing that (mostly the LRA saying "if we find something during redevelopment activities then we will address it, but if the Army says it is clean now that is good enough for

us). The property was scheduled for FOST (clean) transfer in October 2012 (774 of the 1,100 acres) - did this happen???

#4. Army BRAC personnel - and the LRA - have an argumentative stance towards the State, and routine requests and comments made by the state are rebuffed or ignored.